

## **REMARKS**

Claims 1, 2, 4, 10, 12, 14-19, and 22 are amended. Claim 13 is canceled. Claims 1-12 and 14-22 remain in the Application. Reconsideration of the pending claims is respectfully requested in view of the above amendments and the following remarks.

### **I. Claims Rejected Under 35 U.S.C. § 102**

Claims 1, 6, 12, 13, 15, 16, and 19-22 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,775,779 issued to England et al. ("England").

To anticipate a claim, the Examiner must show that a single reference teaches each of the elements of that claim. Applicants submit that England at least does not teach "a graphics card coupled to the processor and accessible to different areas of the system memory according to access modes asserted by the graphics card," as claimed in amended Claim 1.

England discloses a software structure for protecting premium content using code modules that are arranged in a hierarchy of trust (Abstract and FIG. 4). However, England does not disclose a graphics card that can access different areas of the system memory according to an access mode asserted by the graphics card. Rather, England discloses that peripheral devices (e.g., a sound card) are granted access to the system memory according to their physical locations in the PCI (or other expansion bus) slot (col. 13, lines 19-27). Granting access by physical slot locations is entirely different from granting access according to an access mode asserted by the peripheral device. In England, once a sound card is placed into a PCI slot, the region of system memory to which it has access is determined. To access a different region of the system memory, the sound card needs to be plugged into a different PCI slot that is conferred a different level of trust. The same sound card cannot actively **assert** one access mode to access one area of the system memory and **assert** another access mode to access another area of the system memory. Thus, England does not disclose that the system memory is accessible according to an access mode asserted by the graphics card.

Analogous discussions apply to independent Claim 19, which is amended to include similar limitations.

With respect to Claim 12, this claim is amended to include the element of "handling the output data from the isolated output area and non-isolated area of the system memory differently

at a graphics card that operates, and has different memory access privileges, in a normal execution mode and the isolated execution mode.” England does not disclose these elements. England does not disclose a graphics card that operates in two different execution modes. England also does not disclose a graphics card that has different memory access privileges in two different execution modes. Moreover, England does not disclose that a graphics card handles the output data from the isolated output area and non-isolated area of the system memory differently. As mentioned above in regard to Claim 1, England at most discloses that a sound card can access a specific region of memory according to its physical slot location. Thus, England does not teach or suggest each of the elements of amended Claim 12.

Claim 13 is canceled. In regard to Claims 6, 15, 16, and 20-22, these claims respectively depend from Claims 1, 12, and 19, and incorporate the limitations thereof. Thus, at least for the reasons mentioned above in regard to Claim 1, England does not anticipate these claims. Accordingly, reconsideration and withdrawal of the § 102 rejection of Claims 1, 6, 12, 13, 15, 16, and 19-22 are respectfully requested.

## **II. Claims Rejected Under 35 U.S.C. § 103(a)**

A. Claims 2-5, 7-11, 14 and 17 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,775,779 issued to England et al. (“England”).

To establish a *prima facie* case of obviousness, the relied upon references must teach or suggest every limitation of the claim such that the invention as a whole would have been obvious at the time the invention was made to one skilled in the art. Claims 2-5, 7-11, 14 and 17 respectively depend from Claims 1 and 12, and incorporate the limitations thereof. Thus, for at least the reasons mentioned above in regard to Claim 1, England does not teach or suggest each of the elements of these dependent claims.

With respect to Claim 17, England does not teach or suggest “occluding all windows but the first window.” Applicants have carefully reviewed the cited passage and the disclosure in general but have been unable to identify any part of the disclosure that mentions occluding windows. Applicants request that the Examiner point out the specific location of such teaching in the disclosure. Accordingly, reconsideration and withdrawal of the § 103 rejection of Claims 2-5, 7-11, 14 and 17 are requested.

B. Claims 17 and 18 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over England in view of U.S. Patent No. 6,476,806 issued to Cunnif et al. ("Cunnif").

Claims 17 and 18 depend from Claim 12 and incorporate the limitations thereof. Thus, for at least the reasons mentioned above in regard to Claim 12, England does not teach or suggest each of the elements of these claims.

Cunnif does not cure the deficiencies of England. Cunnif is relied on for disclosing image occlusion. However, Cunnif does not disclose "a graphics card coupled to the processor and accessible to different areas of the system memory according to access modes asserted by the graphics card," as claimed in base Claim 12. Thus, England in view of Cunnif does not teach or suggest each of the elements of Claims 17 and 18.

Moreover, with respect to Claim 17, the Examiner indicates that Cunnif discloses occluding all objects behind a bounding box, which is created to enclose the primitives within that object (Office Action on page 16, lines 3-4). However, "all objects behind a bounding box" is different from "all windows on a display." Cunnif at most discloses that the objects behind the bounding box are occluded. Cunnif does not mention whether other displayed objects, which are not behind the bounding box, are occluded. Thus, England in view of Cunnif does not teach or suggest each of the elements of Claim 17 for this additional reason.

Accordingly, reconsideration and withdrawal of the § 103 rejection of Claims 17 and 18 are requested.

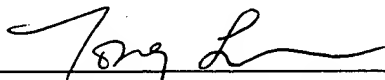
### CONCLUSION

In view of the foregoing, it is believed that all claims are now in condition for allowance and such action is earnestly solicited at the earliest possible date. If there are any additional fees due in connection with the filing of this response, please charge those fees to our Deposit Account No. 02-2666.

Respectfully submitted,

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